

July 19, 2021

VIA ECF

Hon. Vernon S. Broderick United States District Judge 40 Foley Square New York, NY 10007

Re: Medina v. NYC Harlem Foods Inc et al.

Civil Action No. 21-CV-1321 (VSB)

Dear Judge Broderick,

Please be advised that this firm represents the Plaintiff Marisol Medina, on behalf of herself and all others similarly situated, in the above-referenced matter.

The parties participated in a mediation session on July 9, 2021, with an experienced mediator as part of the FLSA mediation program – in preparation thereof, the parties exchanged voluminous records and have met and conferred several times in order to clarify the issues and discuss potential settlement. While the parties did not reach a settlement during the mediation session, the parties wish to continue the mediation process and are hopeful with respect to the progress made. The parties have already scheduled August 31, 2021 to continue the mediation.

The parties, therefore, jointly request a stay of the scheduled deadlines in this matter in order to prevent unnecessary expenses by the parties while they pursue mediation. Rather, the parties would use the time between now and the mediation to further produce and review pertinent records, formulate demands and potential offers, and prepare for the mediation itself. We believe this is in the interest of all parties, and is in the interest of judicial economy if the parties are able to reach a settlement as a result of this mediation.

The parties thank Your Honor for considering the parties' request and for the Court's attention to this matter.

Respectfully submitted,

APPLICATION GRANTED

The parties are directed to file a joint letter updating me on the

progress of their settlement discussions by September 2, 2021.

SO ORDERED A January VERNON S. BRODERICK

U.S.D.J. 7/21/2021

James Bouklas, Esq.

cc: All Counsel via ECF

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